

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

3 davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

4 melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

5 johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

6 jordanjaffe@quinnemanuel.com

50 California Street, 22nd Floor

7 San Francisco, California 94111-4788

Telephone: (415) 875-6600

8 Facsimile: (415) 875-6700

9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANT UBER'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
MOTION TO COMPEL 30(B)(6) TOPICS
AND EXHIBITS THERETO**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendant Uber’s Administrative Motion to File
7 Under Seal Portions of its Motion to Compel 30(b)(6) Topics (the “Administrative Motion”). The
8 Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Motion to Compel 30(b)(6) Topics (“Motion”)	Highlighted Portions	Waymo
Declaration of Esther Chang	Highlighted Portions	Waymo
Exhibits 1, 6 & 8	Highlighted Portions	Waymo
Exhibits 2-5 & 9-12	Entireties	Waymo

14 3. The green and/or red highlighted portions of the Motion, the Declaration of Esther
15 Chang, and Exhibits 6 & 8, as well as the entireties of Exhibits 9-12 contain, discuss, or refer to
16 Waymo’s confidential business information, including internal Waymo documents describing its
17 market analyses, plans, forecasts, and financial information, as well as confidential valuations of
18 Waymo. I understand that this confidential business information is maintained by Waymo as secret
19 and public disclosure would give Waymo’s competitors access to sensitive information that could be
20 used to harm Waymo’s competitive standing. Additionally, the green and/or red portion highlighted
21 portions of the Motion and Exhibit 1, as well as the entireties of Exhibits 2-5 contain, discuss, or refer
22 to confidential details regarding the corporate ownership, corporate leadership, business models,
23 prototype development and testing, and employee recruitment efforts, which Waymo understands are
24 highly confidential to Kitty Hawk, and disclosure of such information would inflict serious and
25 irreparable damage to Kitty Hawk’s business. (See Dkt No. 1115 ¶ 3). Waymo’s request to seal is
26 narrowly tailored to only the confidential information contained in the above-listed documents.

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct, and that this declaration was executed in San Francisco, California, on August 24,
3 2017.

4 By /s/ Felipe Corredor

5 Felipe Corredor

6 Attorneys for WAYMO LLC

7
8 **SIGNATURE ATTESTATION**

9 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
10 filing of this document has been obtained from Felipe Corredor.

11 /s/ Charles K. Verhoeven

12 Charles K. Verhoeven